

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

KIM K. SUMNER,

Plaintiff,

v.

CIVIL ACTION NO. 1:13-cv-00539

**MARYLAND JUDICIARY /
DISTRICT COURT OF MARYLAND,**

Defendant.

o0o

**PLAINTIFF'S MOTION TO ENLARGE TIME FOR COMPLETION OF LIMITED
DISCOVERY MANDATED BY ORDER FILED AUGUST 30, 2013**

Plaintiff, Kim K. Sumner, by her undersigned counsel, moves to modify the scheduling order filed December 2, 2013, to adopt the deadline proposed by the parties for completion of the limited discovery – concerning the supervisory status, *vel non*, of former Administrative Clerk Lonnie Ferguson – as stated in the report of the parties' meeting conducted pursuant to F.R.Civ.P. 26(f). *See* ECF 34.

In their joint report of the Rule 26(f) meeting, the parties requested that the deadline for completion of the above-described limited discovery, which is mandated by the Order of August 30, 2013 (ECF 19), be extended to January 8, 2014.

Both sides propounded interrogatories. Anticipating approval of their joint request described above, neither side has yet responded to the interrogatories thus served.

Undersigned counsel prepared and transmitted to Defendant's counsel, Michele J. McDonald, Assistant Attorney General, a draft of a joint motion seeking the relief prayed herein, but no response had been received as of 11 p.m. on this date (December 6, 2013).

WHEREFORE, Plaintiff prays that the deadline for completion of the limited discovery mandated by the August 30 Order be extended to allow completion of the subject discovery by or on January 8, 2014.

Date: December 6, 2013.

/s/ GERARDINE M. DELAMBO,
Attorney for Plaintiff
Bar No. 28175
705 Deepdene Road
Baltimore, MD 21210
410-433-1132; 443-617-0674 (fax)
sparky4242@comcast.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of December, 2013, a copy of the instant Motion was served electronically upon Defendant's counsel, Michele J. McDonald, Assistant Attorney General, at mmcdonald@oag.state.md.us.

/s/ GERARDINE M. DELAMBO